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9 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

10
11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC
COMPANY,**

15 **Debtors.**

16 Affects PG&E Corporation
17 Affects Pacific Gas and Electric Company
18 Affects both Debtors

19 * *All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

20 Bankruptcy Case No. 19-30088 (DM)

21 Chapter 11

22 (Lead Case) (Jointly Administered)

23 **REORGANIZED DEBTORS' REPORT ON
RESPONSES TO ONE HUNDRED
SIXTEENTH OMNIBUS OBJECTION TO
CLAIMS AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

24 **[Re: Dkt. No. 12506]**

25 **Regarding Objections Set for Hearing
July 26, 2022, at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the following omnibus claims objection (the “**Omnibus Objection**”):

Docket Number	Omnibus Objection
12506	<i>Reorganized Debtors' One Hundred Sixteenth Omnibus Objection to Claims (ADR No Liability Claims)</i> (the "Omnibus Objection")

RELIEF REQUESTED IN THE OMNIBUS OBJECTION

The Omnibus Objection seeks to disallow and expunge the Proof of Claim listed in Exhibit 1 to the Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection [Docket No. 12508]. The Omnibus Objection was also supported by the declaration of Robb McWilliams [Docket No. 12507] (the “Declaration”). The Omnibus Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of Service of Sonia Akter*, filed on June 26, 2022 [Docket No. 12553]. Each holder of a claim listed on Exhibits 1 to the Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Omnibus Objection has passed. The Reorganized Debtors did not receive any formal and informal responses.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and/or expunging the Proofs of Claim listed in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objection, except as otherwise discussed above.

Dated: July 19, 2022

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors